



LAKE COUNTRY STATE BANK

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Johns F. Carter, Director Federal Deposit Insurance Corporation San Francisco Regional Office 25 Jessie Street @ Ecker Square – Suite 2300 San Francisco, CA 94105

Re: Wal-Mart ILC Application

Dear Sir:

September 7, 2005

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This letter is forwarded in regards to the comment period regarding the above application.

The writer hereof is a banker from a small town of 3,500 persons in central Minnesota called Long Prairie, (see map enclosed). You will note the town is approximately 30 miles west of Alexandria, 24 miles west of Little Falls, 17 miles north of Sauk Centre and 48 miles southwest of Brainerd. All of these communities either now have or shortly will have the "famed" Super Wal-Mart stores.

So what, you say? This community, Long Prairie, once had a thriving main street, Gambles Department Store, now gone, two catalog stores, now gone, men's clothing store, now gone, jewelry store, now gone, seven or eight gas stations, now five, and some other small mom & pop businesses, but no longer.

When Wal-Mart, with their seemingly unlimited advertising TV budget, hit the air waves with the announcement of their new stores in Alexandria and Brainerd, our mobile society hit the road. Granted, these communities have more than just a Wal-Mart, but the Wal-Mart in these communities affects those main streets as well. No use to bore you with statistics, you've already heard those; my point is have you heard from an affected community...like Long Prairie!

The point of the aforementioned is brought to your attention to illustrate the affect Wal-Mart could have on community banking.

Wal-Mart would "cherry-pick" our loans, like farm credit <u>has</u> done, would thrive off the FDIC premiums community banks <u>have</u> paid, like the Merrill Lynches and other brokerage houses <u>are</u> doing, and would probably find many loopholes to enable them to eliminate any state or federal tax liability similar to the credit union industry which, unfortunately, <u>already does</u>, although that freedom has been given to them by a congress who says 'no change in their tax status except in case of a catastrophe'.

If Wal-Mart gets into the banking business it will be a Catastrophe of Main Street American Banking as it already has for so many main street American businesses. Again, I draw your attention to the statistics you have already been aware of by the banking associations and others.





This writer is associated with another community bank, as chairman of Pine Country Bank, Little Falls. The affect of a Wal-Mart in that community would be similar to the affect on the city of Long Prairie. Although the final approval isn't in for approval of a Wal-Mart store there, the fear threatening their main street businesses is causing much 'shortness of breath' there too.

As a regulator, this writer urges you to consider the outcome of a decision approving the application in question; to approve would greatly affect the longevity of community banking; to deny would provide rural America with continued "community minded banking".

Sincerely,

Chairman/President

Encl.